

1 GRIFFITH H. HAYES, ESQ.
Nevada Bar No. 7374
2 DANIEL B. CANTOR, ESQ.
Nevada Bar No. 14180
3 LITCHFIELD CAVO LLP
3993 Howard Hughes Parkway, Suite 100
4 Las Vegas, Nevada 89169
Telephone: (702) 949-3100
5 Facsimile: (702) 916-1776
Hayes@LitchfieldCavo.com
6 Zimmer@LitchfieldCavo.com
Attorneys for Defendant, Security Service
7 Federal Credit Union

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 KAMERON TERRY,

11 Plaintiff,

12 v.

13 SECURITY SERVICE FEDERAL CREDIT
UNION and EXPERIAN INFORMATION
14 SOLUTIONS, INC.,

15 Defendants.
16
17
18
19
20
21

CASE NO.: 2:20-cv-00736-GMN-NJK

STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT

FIRST REQUEST

22 Plaintiff, **KAMERON TERRY** (“Plaintiff”) by and through its attorneys of record, Kazerouni
23 Law Group, APC, and Defendant, **SECURITY SERVICE FEDERAL CREDIT UNION** (“Security
24 Service”) by and through its attorneys of record, Litchfield Cavo LLP, hereby submit this stipulation
25 to extend time for Security Service to respond to Plaintiff’s Complaint [EFC 1] pursuant to LR IA 6-
26 1.

- 27 1. Plaintiff filed its Complaint on April 23, 2020 [EFC 1].
28 2. Security Service was served on April 30, 2020.

3. The responsive pleading of Security Service is currently due May 21, 2020.

4. Defendant Security Service shall have an extension of 14 days from May 21, 2020, to answer, move, or otherwise respond to Plaintiff's complaint to and including June 4, 2020.

5. This is Security Service's first request for an extension of time to respond to the Complaint and it is not intended to cause any delay or prejudice to any party, but due to certain delays caused by the various jurisdictions' stay at home orders and to permit Plaintiff and Security Service an opportunity to more fully investigate the claims alleged.

Dated: May 19, 2020

KAZEROUNI LAW GROUP, APC

By: /s/ Gustavo Ponce, Esq.
GUSTAVO PONCE, ESQ.
Nevada Bar No. 15084
6069 South Fort Apache Road, Suite 100
Las Vegas, NV 89148
Tel: 800-400-6808
Fax: 800-520-5523
gustavo@kazlg.com
Attorneys for Plaintiff Kameron Terry

Dated: May 19, 2020

LITCHFIELD CAVO LLP

By: /s/ Daniel B. Cantor, Esq.
GRIFFITH H. HAYES, ESQ.
Nevada Bar No. 7374
DANIEL B. CANTOR, ESQ.
Nevada Bar No. 14180
3993 Howard Hughes Parkway, Suite 100
Las Vegas, Nevada 89169
Telephone: (702) 949-3100
Facsimile: (702) 916-1776
Hayes@LitchfieldCavo.com
Zimmer@LitchfieldCavo.com
Attorneys for Security Service Federal Credit Union

ORDER

Pursuant to the parties' stipulation, **IT IS SO ORDERED**. Defendants should answer or otherwise respond to Plaintiff's complaint on or before June 4, 2020.

Dated: May 20, 2020


United States Magistrate Judge